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*Attorneys for Debtors and Reorganized
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**SCHEDULING STIPULATION
REGARDING THE AMENDED
MOTION FOR RELIEF FROM
ORDER BY DEFAULT
DISALLOWING AND EXPUNGING
PROOFS OF CLAIM PURSUANT TO
REORGANIZED DEBTORS'
ELEVENTH AND THIRTEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTIONS (CLAIMS BARRED BY
THE STATUTE OF REPOSE)**

Related to Dkt. No. 11734, 11735

Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and DRRT (together with the Debtors and Reorganized Debtors, the “**Parties**”), on the other hand, by and through their respective counsel, hereby stipulate and agree as follows:

RECITALS

A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

B. On December 21, 2020, DRRT filed the *Amended Motion for Relief from Order by Default Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors’ Eleventh and Thirteenth Securities Claims Omnibus Objections (Claims Barred by the Statute of Repose)* [Dkt. No. 11734] (the “**Motion**”). DRRT noticed the hearing for January 18, 2022 (the “**Hearing**”). See Dkt. No. 11735.

A. The Parties seek to set briefing deadlines and a Hearing date as set forth below.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:

1. The deadline for the Reorganized Debtors to submit any response to the Motion shall be January 25, 2022.

2. The deadline for DRRT to submit any reply in furtherance of the Motion shall be February 8, 2022.

3. The Hearing shall be set for February 15, 2022 at 10:00 a.m. (Pacific Time).

4. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

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Dated: December 27, 2021

WEIL, GOTSHAL & MANGES LLP

/s/ Richard W. Slack

Richard W. Slack

*Attorneys for Debtors
and Reorganized Debtors*

Dated: December 27, 2021

MEYER LAW GROUP LLP

/s/ Brent D. Meyer

Brent D. Meyer

Attorneys for DRRT